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CRIMINAL COMPLAINT

United States District Court	DISTRICT of ARIZONA
United States of America	DOCKET NO.
v. Jay Desmond Jackson DOB: 1963; United States	MAGISTRATE'S CASION 0 6 4 9 8 M J

Complaint for violation of Title 8, United States Code §§ 1324(a)(1)(A)(ii) & 1324(a)(1)(B)(i); 1325; 18 USC § 3

COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:

COUNT 1 (Felony) On or about September 25, 2019, at or near Whetstone, in the District of Arizona, Jay Desmond Jackson, knowing or in reckless disregard that certain aliens, namely Jose Garcia-Perez, Armenio Dario Cano-Orrego, and Eduardo Gonzalez-Gonzalez, had come to, entered, and remained in the United States in violation of law, did transport and move said aliens within the United States by means of transportation and otherwise, in furtherance of such violation of law and did so for the purpose of private financial gain; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i).

COUNT 2 (Misdemeanor) On or about September 25, 2019, at or near Whetstone, in the District of Arizona, Jay Desmond Jackson, knowing that certain illegal aliens, Jose Garcia-Perez, Armenio Dario Cano-Orrego, and Eduardo Gonzalez-Gonzalez, had entered the United States at a time or place other than as designated by immigration officers, did knowingly assist Jose Garcia-Perez, Armenio Dario Cano-Orrego, and Eduardo Gonzalez-Gonzalez so that they would not be apprehended by law enforcement by transporting them in the vehicle that Jay Desmond Jackson was driving; in violation of Title 8, United States Code, Section 1325(a)(1) and Title 18 United States Code, Section 3.

BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:

See Federal rules of Criminal Procedure Rules 3 and 54

On or about September 25, 2019, at or near Whetstone, in the District of Arizona, United States Border Patrol Agents (BPA) observed a 1999 black Isuzu Rodeo traveling northbound by the SR-90 immigration checkpoint. The checkpoint was closed due to the rain. BPA observed the driver side window was rolled down even though it was raining. BPA observed an African American male driver, a front passenger, and multiple rear seat passengers. BPA followed the vehicle and noticed an Arizona Temporary License Plate which was unreadable and BPA was not able to conduct a registration check. BPA noticed that the driver continuously checking his side mirror and failed to maintain a consistent speed. BPA conducted a vehicle stop and identified the driver as, **Jay Desmond Jackson**, and an adult female front seat passenger, both United States Citizens. The rear passengers appeared to be asleep and the driver told BPA that he was giving them a ride. BPA determined that the rear passengers were in the United States illegally.

Material witnesses Jose Garcia-Perez and Eduardo Gonzalez-Gonzalez stated that they had made arrangements to be smuggled into the United States for money. Armenio Dario Cano-Orrego claimed that he was headed to Phoenix and that he did not make any arrangements to be taken there. Garcia stated that he crossed the International Boundary Fence and walked for 45 minutes through the desert and waited for a call from his smuggler. He stated that he was told to get into a vehicle that was going to stop at the highway. He stated that he picked up by a dark skinned male driver and a white female passenger with blonde hair in a black car. Gonzalez and Cano claimed that they asked for a ride when a vehicle pulled over on the highway. Cano stated that the driver made another stop to pick up another make who was asking for a ride. Gonzalez stated that they were in the car approximately one hour until they were stopped by BPA.

MATERIAL WITNESSES IN RELATION TO THE CHARGE: Jose Garcia-Perez, Armenio Dario Cano-Orrego, and Eduardo Gonzalez-Gonzalez

DETENTION REQUESTED
COMPLAINT REVIEWED by AUSA JAA/ri

Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge

SIGNATURE OF COMPLAINANT

OFFICIAL TITLE & NAME:
U.S. Border Patrol Agent

DATE
September 26, 2019